

the amount of \$450,000.00, plus interest as allowed by law, based on the allegations against Defendant Edd Conn as contained in Count I (Fraud), Count III (Aiding and Abetting Fraud), Count V (Conversion), Count VI, (Trespass De Bonis Asportatis), Count VII (Unjust Enrichment), Count VIII (Replevin). The Plaintiff waives any attorney's fees and prejudgment interest not provided for by contract or statute, punitive or treble damages, and any other non-sum certain damages which it may otherwise recover from Defendant Edd Conn for these allegations. The amount of Plaintiff's damages as detailed in the Complaint and attached Affidavit of Michael Selverne, and due Plaintiff from Edd Conn, is a sum certain of \$450,000.00.

4. The undersigned has submitted and attached a Declaration in support of this motion.

WHEREFORE, Plaintiff, Why Drive 55, Inc. prays that the Clerk enter a Default Judgment in Plaintiff's favor against each of the Defendant Edd Conn, in the sum certain amount of \$450,000.00, plus interest as a allowed by law.

This, the 24th day of February, 2014.

s/ Sean D. Soboleski,
NC Bar Number: 27620
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to Plaintiff in the amount of \$450,000.00.

7. That Defendant Edd Conn, upon information and belief, is not a minor, nor an incompetent person.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the forgoing is true and correct to the best of my knowledge.

This, the 24th day of February, 2014.

s/ Sean D. Soboleski,
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